

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

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Phillip David Schaub,

Plaintiff,

06-CV 002725-001

-Against-

The County of Olmstead; Olmstead County Adult
Detention Center; Steven VonWald; International
Home; Bernard Seizer; John Does 1-6
Defendants.

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INITIAL DISCLOSURES OF PLAINTIFF

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, the
answering Defendants make the following initial disclosures:

(A) *The name and, if known, the address and telephone number of each
individual likely to have discoverable information that the disclosing party may use
to support its claims or defenses, unless solely for impeachment, identifying the
subjects of the information.*

Steven VonWald

Director, Olmstead County Jail
101 4th Street SE
Rochester, MN 55904

Kathryn A. Stolpe, M.D.

Mayo Clinic
Chair of Department of Physical
Medicine
200 First Street SW
Rochester, MN 55905

Mark Christofferson

Mayo Clinic
Department of Rehabilitation
200 first Street SW
Rochester, MN 55905

Dr. Aderonke Mordi

International Quality
Homecare Corporation
602 11th Avenue NW, Suite 100
Rochester, MN 55901

Carol Gattfield

Registered Nurse
International Quality
Homecare Corporation
602 11th Avenue NW, Suite 100
Rochester, MN 55901

Each of the aforementioned witnesses are expected to testify regarding the conditions at Olmstead County Jail, Plaintiff's medical condition and the care and treatment rendered to Plaintiff during his confinement.

Plaintiff reserves the right to supplement the list of witnesses.

(B) *A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment:*

Documents, located at the Olmstead County Jail together with Plaintiff's medical records from the Mayo Clinic for before his confinement, during his confinement and after his confinement regarding his medical condition upon entering Olmstead County Jail and the care and treatment he received while confined to the facility and the resulting injuries caused thereby.

Plaintiff reserves the right to supplement this list of documents.

(C) *A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent injuries suffered;*

As a result of the actions of the Defendants herein Plaintiff has suffered and continues to suffer from numerous infections which have caused continuous hospitalizations from the date of his release through to the current time. Documentation will be provided under separate cover.

(D) *For inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.*

Not applicable.

Dated: Woodbury, New York
May 16, 2007

Law Offices of
Anthony J. Colleluori
& Associates
Attorney for Plaintiff

_____/s/_____

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(516) 741- 3400